

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL GORCHOCK,

Plaintiff,

v.

FIRSTENERGY CORP., et al.,

Defendants.

Civil Action No. 2:17-cv-01494-DSC

Consolidated for discovery purposes with:
19-1323, 19-1324, 19-1325, 19-1329, 17-1496,
17-1497, 17-1499

**JOINT MOTION FOR LEAVE OF COURT TO FILE PETITIONS FOR APPROVAL OF
SETTLEMENT OF WRONGFUL DEATH AND SURVIVAL ACTIONS UNDER SEAL**

AND NOW, come Plaintiffs, Kerri Ann Bachner, Administratrix of the Estate of Kevin Patrick Bachner, and In Her Own Right (“Kerri Ann Bachner”) and Alisa M. Gorchock, Administratrix of the Estate of John M. Gorchock, and In Her Own Right (“Alisa M. Gorchock”), along with Defendants and Third-Party Plaintiffs, First Energy Corp., FirstEnergy Generation, LLC, FirstEnergy Generation Mansfield Unit 1 Corp (collectively “First Energy”), Third Party Defendant, Enerfab, Inc., and Defendant, URS Corporation, by and through their respective undersigned counsel, and hereby submit the instant Joint Motion for Leave to File Petitions for Approval of Wrongful Death and Survival Actions Under Seal, stating as follows:

1. This action arises out of an incident that occurred in the hours between August 29 and August 30, 2017, at the Bruce Mansfield Plant located at 128 Ferry Hill Road, Shippingport, Beaver County, Pennsylvania 15077.
2. Kevin Patrick Bachner and John M. Gorchock died as a result of the incident and thereafter, lawsuits were initiated.
3. The actions subsequently settled at a private mediation occurring on April 25, 2022 and April 26, 2022.

4. The parties have agreed to the confidentiality of the settlements and executed a Term Sheet at the mediation memorializing their agreement.

5. Plaintiffs, Kerri Ann Bachner and Alisa M. Gorchock, must obtain court approval of the settlements of the wrongful death and survival actions of the Estate of Kevin Patrick Bachner and the Estate of John M. Gorchock.

6. The Plaintiffs, Kerri Ann Bachner and Alisa M. Gorchock, along with Defendants and Third-Party Plaintiffs, First Energy, Third Party Defendant, Enerfab, Inc., and Defendant, URS Corporation, hereby request that Plaintiffs, Kerri Ann Bachner and Alisa M. Gorchock, be permitted to file their Petitions for Approval of Settlement of Wrongful Death and Survival Actions under seal.

7. The Plaintiffs, Kerri Ann Bachner and Alisa M. Gorchock, along with Defendants and Third-Party Plaintiffs, First Energy, Third Party Defendant, Enerfab, Inc., and Defendant, URS Corporation, further request that the requirement that Plaintiffs file redacted versions of their Petitions with the Court be waived.

WHEREFORE, Plaintiffs, Kerri Ann Bachner and Alisa M. Gorchock, along with Defendants and Third-Party Plaintiffs, First Energy, Third Party Defendant, Enerfab, Inc., and Defendant, URS Corporation, respectfully request that this Honorable Court enter the Order attached hereto.

Respectfully submitted,

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Date: June 16, 2022